

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE METHYL TERTIARY BUTYL ETHER  
("MTBE) PRODUCTS LIABILITY  
LITIGATION

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88

This document relates to:

*Commonwealth of Puerto Rico, et al. v.  
Shell Oil Co., et al.*, No. 07 Civ. 10470 (SAS)

SHIRA A. SCHEINDLIN, U.S.D.J.

**[PROPOSED] CASE MANAGEMENT ORDER NO.**

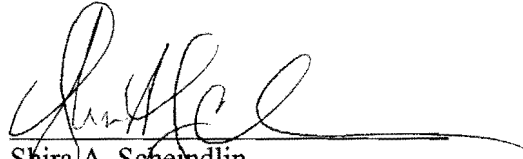
1. The parties shall abide by the following schedule, which dates supersede those set forth in CMO 110:

| Date               | Deadline  |
|--------------------|---|
| September 27, 2013 | Deadline to serve Requests for Production of Documents to parties.  |
| October 11, 2013   | Deadline to serve deposition notices to parties (which can include requests that 30(b)(6) deponents and fact witnesses produce documents relied on to prepare for the deposition or identify such documents if they have been previously produced) and deposition notices (with subpoena <i>duces tecum</i> ) to third parties. To the extent a fact witness is first identified during a deposition after October 11, 2013, a party may notice the witness's fact deposition within 7 business days of such identification. To the extent a request for production has been issued with a deposition notice prior to September 27, 2013, such document requests are not limited by anything contained in this paragraph and are not affected by this paragraph should such notice need to be amended after September 27, 2013. |
| December 6, 2013   | Deadline to complete fact discovery.<br>Plaintiffs to serve non-site specific expert reports.<br>Plaintiffs to designate site-specific experts.   |
| January 8, 2014    | Defendants to designate site-specific experts.  |
| January 22, 2014   | Plaintiffs to serve site-specific expert reports.<br>Defendants to serve non-site specific expert reports.  |

| Date              | Deadline   |
|-------------------|--|
| February 28, 2014 | Plaintiffs to serve non-site-specific rebuttal expert reports, if any. |
| March 24, 2014    | Defendants to serve site-specific expert reports.                      |
| April 18, 2014    | Plaintiffs to serve site-specific expert rebuttal reports, if any.     |
| April 28, 2014    | Deadline to serve Requests for Admission.                              |
| May 30, 2014      | Close of expert discovery.   |

**NO FURTHER EXTENSIONS WILL BE GRANTED.**

SO ORDERED

  
Shira A. Scheindlin  
U.S.D.J.

DATED: New York, New York  
September 27, 2013